1	George Haines, Esq. Nevada Bar No. 9411		
2	FREEDOM LAW FIRM		
3	8985 S. Eastern Avenue, Ste. 350 Beltway Corporate Center Las Vegas, NV 89123 Telephone:702.880.5554 ghaines@freedomlegalteam.com		
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6	Counsel for Plaintiff Lisa A. Bryant		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9		:	
10	LISA A. BRYANT,		
11	Plaintiff,	: Case No.: 2:20-cv-00594-JAD-EJY :	
12	V.	: :	
13	MADISON MANAGEMENT SERVICES,	: : <del>[PROPOSED]</del> STIPULATION AND	
14	LLC, and WALDMAN & PORRAS, PLLC,		
15	Defendants.	: : [FIRST REQUEST]	
16		: :	
17			
18			
19	Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs Jeffrey K. Engler and		
20	Katherine M. Sennes-Engler ("Plaintiffs") and CMG Mortgage Inc. d/b/a CMG Financial		
21	("CMG") (collectively the "Parties"), by and through their attorneys, hereby stipulate to extend		
22	discovery deadlines and other deadlines in the March 11, 2020 Scheduling Order (ECF No. 24)		
23	as follows:		
24	1. <u>Completed Discovery.</u>		
25	The parties have exchanged initial disclosures. Plaintiff has served written discovery.		
26	2. Remaining Discovery.		
27	Written discovery responses from Defendants and the parties' depositions.		
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## 3. Good Cause.

On October 5, 2020, Defendants filed a Motion for Extension of Time to Responds to Discovery Requests ("Motion for Extension") because Defendants are working remotely and on a reduced staff due to the Covid 19 pandemic. *See* ECF No. 25. On October 21, 2020, the Court granted Defendants' Motion for Extension and Defendants' discovery responses are now due on November 4, 2020. *See* ECF No.26.

Thus, the parties are seeking a 90-day extension to ensure that the pending discovery can be completed without requesting additional time. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not been set at this time.

## 5. Current Discovery Deadlines.

- Discovery Cutoff: January 5, 2021
- Deadline to Amend Pleadings: October 7, 2020
- Deadline to Disclose Initial Expert Disclosures: November 6, 2020
- Deadline to Disclose Rebuttal Expert Disclosures: December 7, 2020
- Dispositive Motion Deadline: February 4, 2021
- Joint Proposed Pretrial Order: March 8, 2021

## 6. **Proposed Discovery Deadlines.**

- Discovery Cutoff: April 5, 2021
- Deadline to Amend Pleadings: January 7, 2021
- Deadline to Disclose Initial Expert Disclosures: February 6, 2021
- Deadline to Disclose Rebuttal Expert Disclosures: March 7, 2021
- Dispositive Motion Deadline: May 4, 2021
- Joint Proposed Pretrial Order: June 8, 2021

WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause supports this request to extend discovery;

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1	NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS	
2	HEREBY STIPULATED AND AGREED, by and between the Parties as follows:	
3	The August 19, 2020 Scheduling Order shall be amended as follows:	
4	Discovery Cutoff: April 5, 2021	
5	• Deadline to Amend Pleadings: <b>January 7, 2021</b>	
6 7	Deadline to Disclose Initial Expert Disclosures: February 6, 2021	
8	Deadline to Disclose Rebuttal Expert Disclosures: March 7, 2021	
9	Dispositive Motion Deadline: May 4, 2021	
10	Joint Proposed Pretrial Order: June 8, 2021	
11	IT IS SO STIPULATED.	
12	DATED 0 4 1 25 2020	DATED 0 ( 1 25 2020
13	DATED: October 25, 2020	DATED: October 25, 2020
14	FREEDOM LAW FIRM, LLC	WALDMAN & PORRAS, PLLC
15	By: /s/ George Haines	By: /s/ Nicholas M. Porras
16	GEORGE HAINES, ESQ. Nevada Bar No.: 9411	NICOLAS M. PORRAS, ESQ. Nevada Bar No.: 12849
17	8985 S. Eastern Ave., Suite 350	201 West Liberty Street, Suite 207
18	Las Vegas, NV 89123 Attorney for Plaintiff	Reno, NV 89501 Attorney for Defendants
19	LISA BRYANT	MADISON MANAGEMENT SERVICES, LLC, AND PORRAS, PLLC
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**ORDER GRANTING** STIPULATION TO EXTEND DISCOVERY In consideration of the parties' stipulation and good cause showing, IT IS ORDERED THAT the August 19, 2020 Scheduling Order shall be amended as follows: • Discovery Cutoff: April 5, 2021 Deadline to Amend Pleadings: January 7, 2021 Deadline to Disclose Initial Expert Disclosures: February 6, 2021 • Deadline to Disclose Rebuttal Expert Disclosures: March 7, 2021 • Dispositive Motion Deadline: May 4, 2021 • Joint Proposed Pretrial Order: June 8, 2021 IT IS SO ORDERED. Dated: October 27, 2020